

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

Case No.: 25-11009-dsj

Manhattan Country School,  
a/k/a Manhattan Country School, Inc.,

Chapter 11

Debtor.

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**AFFIRMATION PURSUANT TO LOCAL RULE 9077-1**

Peter K. Kamran, an attorney duly admitted to practice law before this Court and the courts of the State of New York, affirms the following under penalty of perjury:

1. I am a partner at the law firm of Lester Korinman Kamran & Masini, P.C. counsel to the debtor, Manhattan Country School a/k/a Manhattan Country School, Inc. (the “**Debtor**”) a not for profit education corporation duly organized and existing under the laws of the State of New York. As such I am fully familiar with the facts and circumstances herein. I offer this affirmation in support of Debtor’s motion (the “**Motion**”) seeking the entry of an Order pursuant to section 105 and section 364(d) of title 11 of the United States Code, 11 U.S.C. §§ 101, et seq. (as amended, the “**Bankruptcy Code**”) and Rules 2002, 4001 and 9014 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) (a) authorizing the Debtor to obtain debtor-in-possession financing, (b) granting a superpriority security interest, (c) approving the agreements related to the foregoing, and (d) granting related relief.

2. As is detailed in the underlying papers submitted in support of the Motion, it is critical that the Debtor obtain the financing necessary to prevent the school operated by the Debtor from having to immediately layoff its 79 employees, close its doors, and cease its

operations leaving the 250 children served with extremely limited options for the balance of the school year.

3. The Debtor has not previously sought similar relief in this Court or any other court.

WHEREFORE, it is respectfully requested that this Honorable Court schedule and conduct a preliminary expedited hearing as soon as the Court's schedule permits.

Dated: May 16, 2025  
Garden City, New York



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